

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

**ANTOINE LAND and PARFAIT** )  
**MOUKIAMA, Individually, and on Behalf** )  
**of All Others Similarly Situated,** )

**Plaintiff,** )

**v.** )

**FRONTLINE COMMUNICATIONS,** )  
**INC., GINA URSO, JOHN URSO,** )  
**COMCAST CORPORATION and** )  
**COMCAST CABLE** )  
**COMMUNICATIONS MANAGEMENT,** )  
**LLC** )

**Defendants.** )

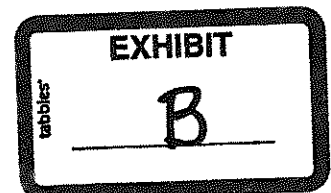
**Case No. 10-cv-07640**

**Honorable Judge Joan H. Lefkow**

**DECLARATION OF RYAN F. STEPHAN**

Ryan F. Stephan hereby declares:

1. I am a principal of the law firm of Stephan Zouras, LLP ("SZ"). I submit this declaration in support of the Parties' Joint Motion for Final Approval of the Class Settlement.
2. I have spent the majority of my professional time in the field of labor relations and, whenever necessary, litigation of those disputes.
3. I started SZ with my law partner James B. Zouras in 2007 and have practiced there for the past five years.
4. I have served as lead counsel on over 20 class and collective actions where we achieved six or seven figure settlement or verdicts. I have tried labor and employment cases to verdict, including a \$9,000,000 verdict obtained on behalf of a class of workers in the United States District Court for the Eastern District of New York.

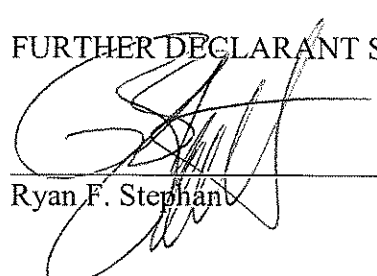


5. Since SZ was first contacted about this matter in October, 2010 its principals and professionals have conducted client intakes, investigated Plaintiff's claims, drafted pleadings, responded to motions, conducted written discovery, reviewed compensation and other records, taken five depositions, analyzed extensive time and payroll data, attended settlement conferences, and worked with opposing counsel to successfully move for preliminary approval of class settlement, amongst other things.

6. SZ has also actively litigated half a dozen similar wage claims brought by technicians and is familiar with the factual and legal elements of such claims. SZ exercised that experience and their intimate knowledge of the facts of the case and the legal issues facing the Named Plaintiffs and Class Members to conduct an independent analysis of the strengths, weaknesses and value of the claims, and the time, costs and expense of protracted litigation, discovery and appeals. In SZ's opinion, the Settlement with Comcast is fair, reasonable and adequate.

7. I have reviewed the claim forms and data submitted by the Claims Administrator. Based on this data, the proposed Settlement ensures that the Settlement Class Members will receive approximately \$26.19 for each week that they worked for Defendants. \$26.19 per week is significant monetary relief, and for practical purposes, means that Settlement Class Members will receive a substantial portion of their claim's potential value.

FURTHER DECLARANT SAYETH NOT.



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Ryan F. Stephan